

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

| | | |
|---------------------------|---|-------------------------------------|
| UNITED STATES OF AMERICA, |) | CASE NO. 1:20-CR-255 |
| |) | |
| Plaintiff, |) | HON. SARA LIOI, JUDGE |
| -vs- |) | |
| |) | |
| JOHN GEORGE MEDAS, |) | <u>MOTION TO PERMIT TRAVEL</u> |
| |) | <u>FOR FAMILY MEDICAL EMERGENCY</u> |
| Defendant. |) | |

Now comes the defendant, by and through the undersigned counsel, and hereby moves this Honorable Court for an order permitting him to travel from his home in Strongsville, Ohio to Atlanta, Georgia to attend to a family medical emergency. As grounds herefor, the defendant submits as follows:

1. That his brother, James Medas is currently in Emory Hospital in Atlanta, Ga. And appears to be in the very last stages of life due to cancer.
2. That Mr. Medas seeks to travel as early as the week of September 6, 2021, depending on the need and the evolving condition of his brother.
3. Mr. Medas is the primary responsible person for his brother's affairs and is his executor and designated medical POA.
4. While in Atlanta Mr. Medas will either stay at a hotel close to the medical facility or at the home of his brother in Carrollton, Georgia. Any address can be provided off the record if requested.
5. Mr. Medas has been thoroughly compliant with all conditions of release on bail.

WHEREFORE, the defendant prays that this motion be granted and that he be granted permission to travel to and from Atlanta as set forth and at times as necessitated by evolving circumstances

Respectfully submitted,

/s/ Robert A. Dixon
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CERTIFICATE OF SERVICE

This document was filed via the ECF system for the U.S. District Court for the Northern District of Ohio and served upon all parties by operation of that system, this 3rd day of September, 2021

/s/ Robert A. Dixon
ROBERT A. DIXON
Attorney for Defendant